Summary of Major Changes
Between 2005 Remediation General Permit (RGP) and 2010 Draft RGP

Disclaimer: This summary of major changes to the RGP is provided as guidance only. This guidance has no regulatory significance and does not represent a comprehensive description of all permit requirements. The permittee should consult the permit for a precise statement of its requirements. The absence or phrasing of any permit term in this outline shall not affect the actual terms and conditions of the permit nor excuse strict compliance with it.

Description	Permit Section
The 2010 Draft RGP adds "Residential Non-Business Remediation Discharges" to categories of discharges subject to the permit. This category is further explained on page 10 of the Fact Sheet.	Part I.A.1.a
The 2010 Draft RGP revises and reduces the Notice of Intent (NOI) sampling requirements. • The 2010 Draft RGP requires the permittee to identify the sub-category within which the potential discharge falls. • The 2010 Draft RGP requires the NOI to include analytical results for the parameters applicable to the sub-category into which the discharge falls. If the permittee has reason to believe the site contains additional contaminants not listed for that sub-category or contains other additional contaminants, those results must be provided with the NOI. The 2005 RGP requires that the NOI include results for <u>all</u> pollutants covered by the permit, regardless of discharge sub-category.	Part I.B.3 and Appendix V
The 2010 Draft RGP clarifies timeframes for reapplying for those covered by the 2005 RGP. • Permittees covered by the 2005 RGP must either reapply for coverage by submitting a Notice of Intent (NOI) to EPA and the State within 90 days after the effective date of the permit or must submit a Notice of Termination (NOT) to EPA and the State within 90 days after the effective date of the permit. • This mechanism is intended to allow discharges covered by the 2005 RGP that are only expected to last several months to maintain coverage and presumably terminate, rather than having to re-apply for coverage.	Part I.B.4.c

Description	Permit Section
The 2010 Draft RGP clarifies effluent limits and influent and effluent monitoring requirements. • After the initial startup sampling and testing requirements have been met, permittees are required to monitor the untreated influent and treated effluent for all the parameters identified in the EPA authorization letter. • For those parameters identified in the EPA authorization letter, the 2010 Draft RGP explains that the permittee must monitor according to the effluent limits and monitoring requirements listed in Appendix III, Appendix IV, and Appendix VI.	Part I.C.4, Appendices III, IV, and VI.
The 2010 Draft RGP includes a revised method of calculating Effluent Limits for Metals for Dilution Factors greater than 0 and less than or equal to 5. • The 2005 RPG set effluent limits for metals assuming no dilution (for Dilution Factors less than or equal to 5). The 2010 Draft RGP sets limits based on actual dilution at these low Dilution Factors. • For a Dilution Factor greater than 0 and less than or equal to 5, metals limits are calculated using the DF times the base limit for the metal. For example, iron limits for DF 0-5 are equal to the base limit of 1,000 ug/L times the DF. For example, if DF is 1.5, the iron limit will be 1,500 ug/L; DF 2, then iron limit =1000 x 2 =2000 ug/L., etc. not to exceed the DF=5. • For Dilution Factors greater than 5, metal effluent limits are calculated using the same methodology as was used in the 2005 RGP.	Part I.C.7 and Appendices IV, V
The 2010 Draft RGP clarifies certification (formerly re-certification) requirements, including a revised timeline for certification. • Discharges lasting for six (6) months or longer from the start of the discharge under the permit are required to certify by letter, including laboratory data, to EPA that all parameters listed on the applicable Individual Sub-Category in Appendix III, that were not required to be monitored per EPA's authorization letter, continue to be believed absent. The 2010 Draft RGP requires that this certification be made between six (6) months and 12 months from the date of EPA's authorization letter and additionally during each subsequent twelve (12) month period that the discharge continues. The certification of any parameter believed absent is required to be based on laboratory data from a minimum of one (1) new untreated influent sample taken within 30 days of the certification request. • Discharges lasting for fewer than six (6) months from the start of the discharge under the permit do not have to certify.	Part I.C.8 a - b

Description	Permit Section
The 2010 Draft RGP increases the minimum duration of laboratory data to be eligible for reduction of influent and effluent monitoring. • To be eligible for a reduction in influent monitoring, the 2010 Draft RGP requires the permittee to provide a minimum of 12 consecutive months of laboratory data demonstrating compliance with the applicable parameter limits and applicable minimum levels. This is an increase over the 6 consecutive months required by the 2005 RGP. • To be eligible for a reduction in effluent monitoring, the 2010 Draft RGP requires the permittee to provide a minimum of 24 consecutive months of laboratory data demonstrating compliance with the applicable parameter limits and applicable minimum levels. This is an increase over the 12 consecutive months required by the 2005 RGP.	Part I.C.8.e - g
The 2010 Draft RGP reduces the initial treatment system startup sampling requirements. • The 2010 Draft RGP reduces the number of influent and effluent sampling rounds required during initial treatment system discharge startup from 3 rounds to 2 rounds. This includes short term discharges (those lasting less than 7 days). • After the first week of sampling (first 2 rounds), if the treatment system is working properly and achieving effluent limits, the 2010 Draft RGP allows sampling to be monthly for the remainder of the discharge, instead of weekly for the first month and then monthly thereafter, as required by the 2005 RGP.	Part I.D.2 and Part I.D.7
The 2010 Draft RGP clarifies the Annual Certification Requirements for the Best Management Practices Plan (BMPP). • The 2010 Draft RGP requires that annually, on the anniversary date of the EPA authorization letter, the permittee certifies that the BMPP was followed during the previous calendar year. The 2010 Draft RGP requires that the permittee, submit the certification to EPA and the State annually, for the first two years. This is a reduction from the 2005 RGP, which required annual submittal of Annual Certifications throughout the duration of permit coverage.	Part I.E.4.d
2010 Draft RGP includes new language specifying that NHDES may add additional water quality certification requirements to the authorization to discharge letter for any New Hampshire discharge. The 2005 RGP did not include such language.	Part I.G.3 and Appendix IV footnote 7 for facilities located in the State of New Hampshire

Description	Permit Section
The 2010 Draft RGP includes streamlined Endangered Species Act and National Historic Properties Act review procedures as compared to the 2005 RGP.	Part I.A.4 and 5 and Appendices V and VII
The 2010 Draft RGP includes the addition of monitoring and reporting for Chloride. The 2005 RGP did not include requirements related to Chloride.	Appendices III, IV, V and VI